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Attorneys for Plaintiff
THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR UNIVERSITY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

THE BOARD OF TRUSTEES OF THE
LELAND STANFORD JUNIOR
UNIVERSITY,

Plaintiff,

vs.

CHIANG FANG CHI-YI, an individual,
CHIANG HSIAO-CHANG, an individual,
CHIANG YO-MEI, an individual, CHIANG
TSAI HUI-MEI, an individual; CHIANG
YO-SUNG, an individual; CHIANG YO-
LAN, an individual; CHIANG YO-BO, an
individual; CHIANG YO-CHANG, an
individual; CHIANG YO-CHING, an
individual; CHUNGYAN CHAN, an
individual; ACADEMIA HISTORICA, an
entity of The Republic of China; CHIANG
HSIAO-YEN, an individual; CHIANG HUI-
LAN, an individual; CHIANG HUI-YUN, an
individual; CHIANG WAN-AN, an
individual, and CHIU JU-HSUEH, an
Individual.

Defendants.

Case No. CV 13-04383-BLF-HRL

~~PROPOSED~~ PROTECTIVE
ORDER RE: INSPECTION

CrtRm: 3, 5th Floor

Judge: Hon. Beth Labson-Freeman

1 In accordance with the hearing held by this Court on March 22, 2018 on the
2 inspection of the deposit materials being stored at the Hoover Institution at Stanford
3 University, IT IS HEREBY ORDERED THAT:

4 **Definitions**

5 1.1 “Deposit” shall mean the materials subject to this litigation *The Board of Trustees*
6 *of the Leland Stanford Junior University v. Chiang Fang Chi-yi, et al.*, Case No.
7 CV 13-04383-BLF-HRL (“Litigation”), that are currently being stored at the
8 Hoover Institution at Stanford University.

9 1.2 “Inspection Results” shall mean any and all copies, reproductions, photographs,
10 summaries, compilations, inventories, memorializations, and/ or notes of any kind
11 made or taken by Academia Historica during the Inspection.

12 1.3 “Confidential – Attorneys’ Eyes Only” means confidential information not
13 generally known to others where disclosure to others would create a substantial
14 risk of serious injury. Unless otherwise ordered by the Court, such material may
15 only be shown to:

16 1.3.1 Counsel of Record in this Litigation;

17 1.3.2 Counsel of Record in the Taiwan litigation (Taipei District Court Case
18 Number 104-4546) (the “Taiwan Action”); and

19 1.3.3 The Court, the Court in the Taiwan Action, and their respective personnel.
20

21 **Order**

22 1. All materials and records created during the course of the inspection of the
23 Deposit, including but not limited to any and all Inspection Results, are hereby designated
24 “Confidential – Attorneys’ Eyes Only” and shall only be used in connection with this
25 Litigation and the Taiwan Action.

26 2. No Inspection Results may be released, copied, distributed, or otherwise
27 made available to the public.
28

1 3. In no case shall access to “Confidential – Attorneys’ Eyes Only” designated
2 material, or copies thereof, be given to any persons or entities other than those specified in
3 1.3.1 to 1.3.3., other than Academia Historica who shall have access for the sole purposes
4 of conducting the inspection and transporting the information and materials to the Court in
5 the Taiwan Action. No party to this Litigation or the Taiwan Action other than Academia
6 Historica – as creator of the Inspection Results – shall have access to the Inspection Results
7 or copies thereof.

8 4. Any and all Inspection Results shall be affixed by Academia Historica with a
9 legend or stamp on such material, bearing the designation “Confidential – Attorneys’ Eyes
10 Only.”

11 5. Prior to distributing any Inspection Results to any persons under 1.3.2 above,
12 the party intending to distribute the Inspection Results shall obtain executed
13 acknowledgements of this Protective Order (“Exhibit A”) from every person that shall have
14 access to the Inspection Results and return executed acknowledgements to all counsel in the
15 Litigation prior to distribution.

16 6. All persons who attend the Inspection shall first sign Exhibit A and provide
17 identification to Stanford pursuant to its usual and customary access requirements, and
18 Stanford agrees to keep such information and will make such information available to
19 counsel of record to this Action, upon request.

20 7. This Protective Order shall not apply to any material that is or becomes
21 publicly available, nor shall it apply to disseminations of “Confidential – Attorneys’ Eyes
22 Only” designated material to persons already in possession thereof.

23 IT IS SO ORDERED.

24 Dated: August 13, 2018.



Hon. Beth Labson Freeman
United States District Judge

Exhibit A

I, _____, of _____ hereby affirm that:

Information, including documents and things designated as “Confidential – Attorneys’ Eyes Only” as defined in the Protective Order Re: Inspection (“Protective Order”) entered in this litigation, will be provided to me pursuant to the terms and restrictions of the Protective Order.

I have been given a copy of and have read the Protective Order.

I am familiar with the terms of the Protective Order and I agree to comply with and to be bound by its terms. I submit to the jurisdiction of this Court for enforcement of the Protective Order.

I agree not to use any “Confidential – Attorneys’ Eyes Only” information disclosed to me pursuant to the Protective Order except for purposes of the Litigation and the Taiwan Action and not to disclose any of this information other than as specifically authorized by the Protective Order.

DATED: _____

CITY, STATE WHERE SWORN AND SIGNED: _____

PRINTED NAME: _____

SIGNATURE: _____

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